

FEB 21 2023

Benjamin H. Adams

February 20, 2023

Thad Berrett, District Ranger
1415 Fort Street
Buffalo, WY 82834

Dear Mr. Berrett:

I am writing to comment on the proposed vegetation management plan for the Powder River Ranger District of the Big Horn National Forest. As an avid non-motorized outdoor recreationist, I am particularly concerned about the impact of the project on non-motorized winter recreation. The Powder Pass Nordic Club has had a longtime working relationship with the local Forest Service recreation staff, but it appears that winter recreation was not even considered in the development of the timber harvest plan.

1. The commercial timber harvest areas shown on Project Map 2 include seven regeneration harvest units (clearcuts) and two partial thinning units that overlie ski trails within the Pole Creek Nordic Area. Most of the regeneration harvesting is proposed for the west side of the Nordic area. According to USDA NRCS wind rose data, the prevailing winter winds for our area are primarily from the northwest, and removal of tree cover would severely impact the snow depth on the ski trails. The increased sun exposure due to the loss of tree cover would also increase melting and snow loss.
2. The use of heavy equipment within the harvest units will significantly impact the ski trails. The Nordic club has invested many volunteer hours and substantial funds to maintain the trails. Logging equipment will disturb the trail surface and increase rock exposure that the club has been trying to remediate. Ripping logging roads post-harvest for closure would bring up large rocks which would cause a large outlay of effort and funds to ameliorate.
3. The proposed timber harvesting will have a long-term impact on the ski area. The lodgepole pine that comprises the majority of the tree stands in the area will take up to 80 years to regrow to maturity [[Pinus contorta Dougl \(usda.gov\)](https://www.usda.gov/forestservice/forestmanagement/forestplan/pinus-contorta-douglas-fir)]. Seedlings and immature trees that grow up after harvest will not provide the same cover necessary for reliable snow for skiing.
4. On the east side of the trail area is a stand of lodgepole pine that may classify as "Old Growth", according to the criteria laid out by Mehl, 1992. The 2005 forest plan specifically states that old growth stands should be maintained. This stand may not reach the 100-acre threshold, but it is an important component in that area, providing thermal cover for elk and other wildlife species, as well as snow catchment for the ski trail through it.
5. Loss of the winter recreation area will have an economic impact on the city of Buffalo. My wife and I frequently see out-of-state vehicles parked at the Pole Creek area, particularly during the holidays. Those users undoubtedly purchase gas and food on their way through Buffalo, and purchase or rent winter gear at the Sports Lure. Our family has rented x-country ski equipment many times over the years to use at Pole Creek. It is an ideal area for children and novice skiers, due to the groomed trails

and easy terrain. I would guess that many of the winter users of the Muddy Guard and Pole Creek cabins are attracted to the area because of the x-country skiing.

6. One significant advantage of the existing ski area is the lack of motorized use in the winter. We frequently ski other parts of the national forest, including the areas around Munker's Pass and Forest Road 449. Unfortunately, snowmobilers and ATV users create deep ruts that make it difficult for x-country skiing, and winter logging in the Pole Creek area will likely encourage more motorized use.
7. Excluding the wilderness, nearly 99.99% of the Big Horn Forest is open to motorized winter recreation. Instead of adding trails for snowmobiles, I feel the forest should be CLOSING roads and trails to snowmobilers and increase the percentage of non-motorized winter recreation areas available. This would be in keeping with the national objective of getting people outside and getting and staying fit.
8. Large clearcuts (regeneration harvest units) of the size and scope that have been conducted on the Powder River Ranger District have been shown over the years to increase sedimentation and reduce water and air quality in the downstream water and airsheds. Adding to that acreage will certainly adversely affect the Buffalo Municipal watershed, causing additional costs to the city's already high cost of water treatment.
9. The proposed treatment to promote aspen recruitment is misguided. The stocking rates of cattle on the Powder River Ranger District is far too high. Reducing those numbers would leave more forage for the large herbivores on the forest, which in turn would reduce the incidence of browsing on young aspen. Perhaps a test by fencing some aspen stands to exclude cows and other stands to exclude ALL grazing would be appropriate. Such a test would go a long way toward showing the root causes of lacking aspen recruitment.

If the ranger district is willing to consider some alternatives to the proposed logging areas, I would suggest:

1. Reduce the size of the harvest units to something like 5-10 acres. While this places more of an economic burden on the logging companies, it would be more aesthetically pleasing and would mimic the natural processes by providing small openings in the canopy, more along the lines of small fires and tree senescence.
2. Consider more partial harvesting, like the units proposed for the highway corridor, rather than regeneration harvesting.
3. Allow expansion of the non-motorized Nordic area, possibly to the northwest where there are younger stands of trees. This would require that roads be closed at least seasonally to prevent damage to groomed trails. However, the existing parking area that is plowed by the Wyoming Highway Department limits where any expansion could occur.
4. Closing more roads and trails to motorized winter recreation would attract more backcountry winter recreationists who are unable to access the wilderness. I will be 73 years old this year, and skiing into the wilderness is just not something I am able to do these days.

It appears that the Forest Service mandate to manage for multiple use has gone by the wayside in the planning of this vegetation management project. Timber harvesting has taken priority over other uses, and impacts to an established, long-term winter recreation use was not even considered.

Sincerely,

Benjamin H. Adams